

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION

TRAVIS DUNCAN, )  
Plaintiff, )  
vs. ) Case No. 17-03404-CV-S-BP  
BLACKBIRD PRODUCTS GROUP, LLC, )  
Defendant. )

**MOTION TO EXTEND FACT DISCOVERY DEADLINE AND TO  
CLARIFY THAT THE DEPOSITIONS OF DESIGNATED EXPERTS  
MAY BE TAKEN AFTER THE EXPERT DESIGNATION  
DEADLINE**

COMES NOW Defendant by and through its attorney Christopher P. Lawson of Lawson Law Office, LLC and moves the Court for an Order granting extension of the fact discovery deadline to October 15, 2020 and to clarify that depositions of designated experts may be taken after the expert designation deadline.

1. Both parties have been working with the Special Master to finish the *Ameriwood* production and to finish scheduling depositions on or before October 15, 2020.
2. Additionally, there has not yet been a ruling on Plaintiff's objection to Defendant's subpoenas of certain fact witnesses which also impacts Defendant's ability to take such witnesses' deposition.
3. Defendant also seeks clarification that depositions of designated experts may be made after the expert designation deadline.

**WHEREFORE**, for the reasons stated above, Defendant requests that the Court grant an extension of fourteen days for fact discovery and to clarify that each party may take the

deposition of designated experts after the expert designation deadline, and for such other and further relief as the Court deems just and proper.

Respectfully Submitted,

**LAWSON LAW OFFICE, LLC**

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## **CERTIFICATE OF SERVICE**

I DO HEREBY CERTIFY that a true and correct copy this document was e-filed without error and was transmitted to Plaintiff and Counsel by the Court's Electronic Case File System on October 2, 2020 addressed to:

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